

1           Q     When you were preparing, for example, the issues  
2     programs list when you were the General Manager at the Ft.  
3     Dodge station, did you consult with an attorney in terms of  
4     what it was that you actually had to have on that list?

5           A     Uh-uh.

6           Q     What did you do?

7           A     I just read the regulations.

8           Q     You read the rule?

9           A     Uh-hum.

10          Q     Just for purposes of the Court Reporter, when I  
11     ask a question and you're either going to respond  
12     affirmatively or negatively, that you say yes or no.

13          A     Okay.

14          Q     I understand when you're saying something, the  
15     um-hum, but the record doesn't pick it up very well. So,  
16     when we look at it months from now and we have no idea what  
17     we were talking about, it makes it difficult for us to  
18     remember.

19          A     All right.

20          Q     So, anyway, just to make sure that we got the  
21     information here, when you were the General Manager of the  
22     Ft. Dodge station, did you consult with an attorney in terms  
23     of determining what it was you needed to have on those lists  
24     when you put them in the Public File?

25          A     No, I did not.

1           Q     But what you did was you looked at the FCC rule  
2     and then determined from that what it was you had to do?

3           A     Yes. I should add one other thing too, there are  
4     lots of, I think CBB may publish something, I know that the  
5     Program Directors group, I forgot what their technical group  
6     is, there are plenty of support groups for managers that  
7     also give you pointers and that, so I came across those  
8     throughout being a Program Director as well.

9           Q     By that you mean a document that would be like a  
10    cheat sheet in a way --

11          A     A cheat sheet, yes.

12          Q     -- that would tell you, in order to prepare the  
13    Public File you have to do X, Y and Z?

14          A     Right.

15          Q     Now, during your tenure at KALW, which as an  
16    employee we've established that the dates were roughly 1993  
17    to 1999?

18          A     Uh-hum.

19          Q     That's a yes?

20          A     Yes. It could be 1994, I'm not quite sure.

21          Q     Okay, well, that's why I said roughly?

22          A     Yeah, roughly, okay.

23          Q     So, there was anywhere from a five to six year  
24    period when you were at KALW as an employee?

25          A     Right.

1           Q     And during that period do you know whether or not  
2     the radio station had a Public Inspection File?

3           A     Toward the end of that period, so it was not, not  
4     initially, I mean I didn't walk in the door and the first  
5     thing I thought of was where's the Public Inspection File,  
6     that type of thing.

7           Q     No, that wasn't -- my question was more just a  
8     matter of whether or not you knew --

9           A     Where it was.

10          Q     -- well, if it existed?

11          A     No, I didn't.

12          Q     You didn't know whether it existed?

13          A     No.

14          Q     As opposed to, as far as you knew it wasn't there  
15     at all?

16          A     Right. I did not know where it was, whether or  
17     not it was in shape or not, or anything like that.

18          Q     Okay. In other words, the Public File could have  
19     been there but you didn't know where it was?

20          A     Right.

21          Q     And the Public File could have been in good shape,  
22     in the sense that it had every document that the FCC  
23     required, but you wouldn't have known one way or the other?

24          A     Exactly, yes.

25          Q     Did there ever come a time when you looked at the

1 contents of the KALW Public File?

2 A Yes.

3 Q I'm going to show you a document from the Petition  
4 to Deny, it's marked as Exhibit Y, page one of one, and ask  
5 whether or not you can identify that document?

6 A Yes. That's my affidavit.

7 Q In other words, the signature that appears on this  
8 page is yours?

9 A Yes, that's mine.

10 Q And the date is what?

11 A October 31, 1997.

12 Q There's a reference in here to July 23, 1997, what  
13 happened on July 23, 1997 with respect to you?

14 A With respect to me?

15 Q According to this you looked at the Public File,  
16 is that so?

17 A Yes, on July 28th, which would have been --

18 Q Oh, excuse me.

19 A -- that would have been two days before or three  
20 days.

21 Q So, you personally inspected the Public Inspection  
22 File at KALW on July 28th?

23 A Yeah, three days before the filing of the renewal  
24 application.

25 Q All right. And then since I'm not so good at

1 reading upside down, what is the reference to July 23?

2 A Yes, that is a -- that was -- the only thing that  
3 I found in there, with regard to programs issues lists, was  
4 a document that just had a list of program titles and what  
5 looked like an issue. I think that's it right there.

6 Q And what I'm showing you now is a document from  
7 the same Petition to Deny, it bears Exhibit O, page one of  
8 three, and apparently there are three pages to this  
9 document. Could you tell me what this document, to your  
10 understanding, represents?

11 A I know what it represents now, at the time I  
12 didn't. This is from a show called City Visions, and it's a  
13 Monday night program.

14 Q Now, the document itself, it has typed page  
15 numbers at the bottom, and the page numbers that appear are  
16 pages five, six, and I'll get to it here, five, six and  
17 seven. Do you recall whether or not there were pages one  
18 through four that were associated with this document?

19 A What I found in there is what's in the petition,  
20 so I don't recall that there was anything before that.

21 Q Now, how did this document, how did this Exhibit O  
22 actually get into this petition, was this something that you  
23 physically did?

24 A Yeah, I physically did, yes, I copied that.

25 Q You copied it. In other words, well, what

1     happened with the original of what appears here as Exhibit  
2     O?

3             A     I put it back in the Public File.

4             Q     There's some handwriting in the upper right hand  
5     corner, it has 7-23, do you have any knowledge as to what  
6     that's all about?

7             A     I imagine that's July 23rd.

8             Q     Well, tell you what, yeah, you can -- what I want  
9     you to do is, if you know something, you tell me, if you  
10    don't know --

11            A     I don't know.

12            Q     Okay.

13            A     I don't know what that means.

14            Q     So, you didn't put the 7-23 there?

15            A     No, I didn't.

16            Q     Do you know who it was that had any role in the  
17    creation of the original of this Exhibit O?

18            A     No, I don't.

19            Q     You never talked with anybody afterwards to find  
20    out who had created this document?

21            A     No, I didn't.

22            Q     To this day do you have any knowledge as to who  
23    created this document?

24            A     No, I don't.

25            Q     To your understanding, what do the various columns

1 represent, there's one column that says 'Date', there's  
2 another column that says 'Producer', and then there's a  
3 third one that says 'Topic', do you know what that means?

4 A I would --

5 Q Well, having been at the radio station during this  
6 entire period -- if you know?

7 A I now know that these are -- well, let me just say  
8 I can't be sure that these are the date that the shows ran  
9 but I now know that this is a document describing programs  
10 on City Visions, which is a Monday night call-in, one hour  
11 call-in program.

12 Q So, if we were to check the dates --

13 A I imagine those would be Mondays.

14 Q -- they should be Mondays?

15 A Yeah, I imagine that that's what those are.

16 Q And then what do the various, they look like  
17 initials underneath the heading 'Producer' mean?

18 A Yeah. I now know that those are the initials of  
19 the producers, and I believe that --

20 Q Do you know who these individuals are?

21 A John Cobell I believe is JC, but the others I  
22 don't know.

23 Q The BM, you wouldn't know who that person is?

24 A No, I don't know.

25 Q SS?

1 A No.

2 Q LH?

3 A No. KB, I don't know that one either.

4 Q Let's see --

5 A KA, I do not know. RL, CE.

6 Q MI?

7 A Don't know it, no.

8 Q And so it's your testimony that when you took that  
9 document out of the Public File, you photocopied it and then  
10 put the original back?

11 A Yes, I did.

12 Q In looking at the KALW Public File in July of  
13 1997, do you recall seeing documents that would be described  
14 as NPR program guides or KALW program guides?

15 A I don't recall seeing program guides in there.

16 Q Do you know if I were to use the term program  
17 guide, do you know what it is that I'm talking about?

18 A Yes, it's the monthly mailer to listeners  
19 describing what shows are on at what time.

20 Q It's supposed to tell a listener what it is that,  
21 in other words, it's like a schedule, like if you turn on  
22 you're radio two weeks from now on a Thursday night at 9:00  
23 o'clock, this is what you're going to hear?

24 A Exactly.

25 Q That's what the station intended to program?



1 A Right.

2 Q In other words, there could be times when the  
3 station actually didn't carry that program at that time?

4 A Could be.

5 Q Most of the time though, the station would in fact  
6 program according to what appeared on the program guide?

7 A Correct.

8 Q In terms of the KALW Public File, up to July 1997,  
9 when according to the Petition to Deny exhibit, you  
10 inspected the Public File or took a look at it anyway, did  
11 you ever have any role whatsoever with respect to  
12 maintaining the KALW Public File?

13 A No, I didn't.

14 Q Did you have any role whatsoever in creating  
15 documents that were to go in the KALW Public File?

16 A No.

17 Q When you actually looked at the KALW Public File,  
18 where was it physically located?

19 A The first time I actually looked at it, I don't  
20 know if you're interested in knowing why I looked at it?

21 Q We can -- you can --

22 A Okay. The reason why is that Dave Evans, who was  
23 the longest sort of senior management level type person, he  
24 was the chief engineer, he had no power over anybody as a  
25 manager per se but, he was a person who was very passionate

1 about radio and was very concerned about the fact that the  
2 task force was, the task force report was just basically  
3 shelved and never looked at. And as a chief engineer, as  
4 many chief engineers are very persnickety people, he was one  
5 of them, down to the last, you know, if someone didn't read  
6 a legal ID correctly and he happened to be listening, he was  
7 on you, you know, about it, and you'd get a call from him.  
8 So, he was very persnickety about this stuff. And we had a  
9 conversation once and he said, do you realize that this  
10 radio station's Public Inspection File, he said, it's not  
11 just bad, he said, it's practically non-existent. He said  
12 no one is taking any initiative to get it, you know, put it  
13 together, and he told people before, you know, I can't nail  
14 that down but, I know he told Jeff Ramirez about it, he may  
15 have told others before. But, he was really upset about the  
16 Public File, the state of the Public File. And he said, you  
17 know, any group could walk into this radio station and this  
18 license would be gone in two seconds, he said it's that bad.  
19 He said it's beyond repair, it's beyond an excuse that, you  
20 know, my dog ate my homework or whatever, it's beyond that.

21 Q I tried that out regularly.

22 A And it worked for awhile. So, he said it's an  
23 extremely serious situation. And so having been a General  
24 Manager, it never occurred to me to even ever think that,  
25 you know, that was a problem. I looked at it and he was

1 right. There were things from before 1992, from about 1991,  
2 1992, which is just after the previous application period,  
3 that looked to be okay, the stuff that I saw. But, focusing  
4 on what was current, it was dreadful, I mean there was  
5 hardly anything in there.

6 Q After you looked at the Public File on July 28,  
7 1997, did you bring this to the attention of anybody?

8 A I brought it to the attention before July 28,  
9 1997.

10 Q No, did you personally bring it to the attention  
11 of anybody after you looked at the Public File and made your  
12 own determination about what was in and what wasn't in  
13 there, did you go then to somebody in station management and  
14 say anything to them?

15 A Oh yes, yes.

16 Q And who did you speak to?

17 A I spoke with -- well, we decided to circumvent  
18 management.

19 Q When you say we, you're going to have to help me  
20 here in terms of who we is?

21 A Okay. Golden Gate Public Radio that would be  
22 Dave Evans, Mel Baker, me and Deirdre Kennedy, we decided to  
23 circumvent management and we decided to go to the School  
24 Board to talk with School Board members, the commissioners.  
25 We talked with Jill Wynns, who I think she's currently on

1 the board. Jill heard what we had to say, immediately told  
2 us that with the political ramifications on the board she  
3 had very little power, but that she was extremely concerned  
4 about these sorts of things, and said that -- she didn't  
5 tell us much but, she indicated that our reading of it was  
6 that Rojas had so much power that anything that she might --  
7 that this was small compared to other more important  
8 concerns that she was fighting, but she thought something  
9 needs to be done.

10 We talked to --

11 Q When you came to Jill Wynns, about what period of  
12 time was this relative to your having looked at the Public  
13 File?

14 A It was in those, like maybe, I don't know, August,  
15 September, somewhere in that period.

16 Q When you went to Ms. Wynns to talk to her, did you  
17 bring up -- what actually did you bring up with her?

18 A Well, we described the KALW task force and its  
19 report. We described how badly managed KALW was. And we  
20 said that the station is so badly managed it's not in  
21 compliance with some very simple things that they're  
22 supposed to do. They can't even do -- they can't even sit  
23 down and write a one page report to put in a Public File,  
24 it's so badly managed and blah, blah, blah, you know, that  
25 sort of thing. And Jill Wynns was aghast of the whole thing

1 and supported us but then told us, you know, I believe you,  
2 we showed her several things to support what we had to say  
3 but, she said there's no much I can do right now, it's just  
4 not -- I can't put this on my plate, there are bigger things  
5 going on. And I imagine there were, after the news reports  
6 came out later on, after the Rojas administration was  
7 deposed.

8 Q Was there anybody on the School Board besides  
9 Ms. Wynns that you talked with about this problem at KALW?

10 A Yes.

11 Q Who?

12 A We talked with Carlotta Del Portillo, who was also  
13 supportive. We talked with Mary Hernandez, who was not --  
14 she did not register, she just took it in as information,  
15 she's an attorney I believe, so she was much more -- she was  
16 less emotional about what she heard, which we understand.

17 Q She's a School Board member at the time?

18 A She's a School Board member at the time. I  
19 believe she's an attorney. But, she was, you know, she  
20 didn't register one way or the other, but she just took in  
21 the information. And we talked to Dan Kelly, who was  
22 actually a much more powerful member of the School Board.

23 Q What did you tell him?

24 A The same thing we told the other board  
25 commissioners.

1           Q     Now, your conversation with Jill Wynns, was that  
2     simply you and her or were there other people involved in  
3     the conversation?

4           A     That conversation, all of our conversations,  
5     Deirdre Kennedy never came with us, I don't believe, she did  
6     not come with us on any of those meetings. Mel Baker and I  
7     went and had these meetings. So, I don't believe I had any  
8     of them by myself, I believe it was Mel and me, and meeting  
9     with the commissioners. We met with Dan Kelly twice, I  
10    believe. We met with him once, gave him a list of all of  
11    the problems that we felt needed to be addressed at KALW, we  
12    talked for a little while. And then we met with him again  
13    and he walked in the room, handed us the paper and said, I  
14    really don't need to discuss this and he walked out of the  
15    room and that was that.

16          Q     I'm going to show you a document that was included  
17    with the Petition to Deny, it's labeled Exhibit BB, and  
18    could you tell me what this document represents?

19          A     This is, I believe this is a document written by  
20    Jeff Ramirez regarding the response, not the response but  
21    regarding the issues that we had written out when we  
22    presented them to School Board members. So, I think that  
23    this is his own response to those things.

24          Q     So, it's your understanding that this document,  
25    Exhibit BB, was created by Mr. Ramirez?

1 A Yes, I do.

2 Q Now, there's some handwriting that appears on the  
3 document, do you know whose handwriting that is?

4 A I do not know.

5 Q Could you translate any of it for us?

6 A Well, there's a circle on willful false statements  
7 with exclamation points.

8 Q And did you place that circle and the exclamation  
9 points there?

10 A No, that's not my handwriting.

11 Q Do you know who did it?

12 A I do not know.

13 Q And then next to it there is written something,  
14 could you read what it says?

15 A It says, 'RE: Maintenance of Public File'.

16 Q And did you write that?

17 A No, I did not.

18 Q Do you know who did?

19 A Well, I believe Jeff Ramirez wrote this. And --

20 Q Right, the document itself you've indicated that  
21 Mr. Ramirez wrote it. I'm focusing more on the aspect of  
22 the handwriting?

23 A I don't know, I don't know what his handwriting  
24 looks like.

25 Q Then there's some additional handwriting that

1 appears on this document?

2 A Right.

3 Q And could you tell us what that is?

4 A It just says, 'EEO Policy 5 6" something about  
5 'hires through any -- list hires through any EEO process'.

6 Q You didn't write that?

7 A No, I didn't.

8 Q Do you have any knowledge as to who did?

9 A Not direct knowledge, no.

10 Q And what is your indirect knowledge?

11 A Well, this was given to me by Dave Evans.

12 Q This, okay.

13 A This document was provided by Dave Evans.

14 Q Do you know how Dave Evans came to possess this  
15 document?

16 A It's my understanding that Jeff Ramirez gave him  
17 the document.

18 Q And why would, to your understanding, why would  
19 Jeff Ramirez give Dave Evans this document?

20 A Because he's the Chief Engineer.

21 Q Now, what is there in this document that would  
22 require Mr. Evans' input or involvement?

23 A I thing that Dave had been involved as someone  
24 giving Jeff advice all along, from the time that Jeff had  
25 been hired. And in conversations that I had with Dave,



1 toward the end of all of this, when this stuff started to  
2 coalesce and started to grow and, you know, the movement  
3 started to occur toward writing a Petition to Deny, I'm not  
4 sure when there was a separation between Dave and Jeff in  
5 terms of the communication, but maybe apparently at this  
6 time there wasn't, at least up to this point. And so Dave  
7 had access to what was going on. I think what Dave was very  
8 concerned with was that he thought that Jeff was -- he  
9 believed that Jeff lied on the renewal application and  
10 believed that Jeff was going to continue to lie instead of  
11 come clean and start, you know, making -- setting the stage  
12 for some sort of recognition that there were serious  
13 problems at the radio station. Dave didn't think that that  
14 was going to happen. So, I'm, you know, that's kind of  
15 conjecture on my part.

16 Q Well, in terms of the document, Exhibit BB, did  
17 you have any understanding that inclusion of this document  
18 in a publicly filed document was at all inappropriate?

19 A No, I did not.

20 Q And why did you think it might be -- why would you  
21 have thought that it is not inappropriate to have a document  
22 like this included in a publicly filed for all the world to  
23 see?

24 A Because I felt that this was an important piece of  
25 evidence that the people at the radio station were aware of

1 problems, at least documenting as closely as possible so  
2 that in case it became important later down the road, there  
3 is some sort of confirmation so that, you know, my  
4 experience with SFUSD, the task force, and that whole thing,  
5 was that it might be possible that SFUSD would say we didn't  
6 know. So, we thought that this, GGPR, and I guess I should  
7 say I thought this was an important thing to nail down and  
8 to put it in this document so that looking back on it,  
9 hopefully, you know, Jeff Ramirez or whoever, you know, was  
10 responsible for this, would not be able to just say we  
11 didn't know, because there it is, they knew and they  
12 responded to the very things -- we didn't go to Jeff with  
13 any of these items, these are responses to the appeal that  
14 we brought to the commissioners on the Board of Education.  
15 And they may also be responses to -- I believe we may have  
16 also formally made this to their attorney, Ernie Sanchez, as  
17 well, and told him about the specific things that we saw  
18 that were problems too.

19 Q Now, focusing on the Public File aspect of things,  
20 your understanding from looking in July of 1997 was that  
21 there were a number of documents that weren't there, that  
22 should have been there, and then to your knowledge did there  
23 come a time when a renewal application was filed on behalf  
24 of SFUSD for the renewal license of KALW?

25 A Say that again?

1 Q Did there come a time when you became aware that a  
2 license renewal application was filed by SFUSD for KALW?

3 A Yes.

4 Q I want to show you from the Petition to Deny, a  
5 document that bears the writing Exhibit A, page one of 16,  
6 and then it goes on for another 15 pages. Could you tell me  
7 what this document represents?

8 A This is the application for renewal of a radio  
9 station license.

10 Q And in your capacity as a General Manager of a  
11 public radio station, had you ever filled out an application  
12 like this before?

13 A Actually not.

14 Q It so happened that --

15 A It skipped me.

16 Q -- your term as General Manager, there was no  
17 renewal application that ever had to be filed?

18 A Right. But, I was involved, as a Program  
19 Director, helping to make sure the documents were properly,  
20 you know, arranged.

21 Q Now, directing your attention to what's marked as  
22 Exhibit A, page four of 16, there's a question two and a  
23 check box, could you read that?

24 A 'Has the applicant placed in its Public Inspection  
25 File, at the appropriate times, the documentation required

1 by 47 CFR Section 73.3526 and 73.3527", and it's checked  
2 yes.

3 Q And to your knowledge, is that check in the yes  
4 box, is that an accurate representation?

5 A No, it is not.

6 Q And it is not accurate because?

7 A Because there were no -- well, except for the one  
8 document that we looked at earlier, the City Visions  
9 document, there were no others.

10 Q I want to show you another document from the  
11 Petition to Deny, it bears an Exhibit D, apparently there  
12 are two pages to that. And then it follows with Exhibit E,  
13 and there are four pages of that. Could you tell me what  
14 Exhibit D and E are?

15 A Yes. This is the, Exhibit D is the affidavit of  
16 Susan Hecht, who was a volunteer at the radio station. And  
17 Exhibit E is her report to Jeff Ramirez regarding what she  
18 found in the Public File. She was given the task of going  
19 through the Public File to report to Jeff what was missing  
20 and what needed to be taken care of.

21 Q And who was it that Golden Gate Public Radio came  
22 to possess Exhibit E?

23 A She, I believe she gave -- she talked to Dave  
24 Evans about this.

25 Q She meaning Susan?

1           A     Susan Hecht talked to Dave Evans and gave Dave  
2     Evans this document.

3           Q     Now, do you have any knowledge as to Susan Hecht's  
4     current whereabouts?

5           A     None whatsoever.

6           Q     When was the last contact you had with Susan  
7     Hecht?

8           A     It was after the public, after the Petition to  
9     Deny was filed, maybe several months after that. I know her  
10    husband died and she moved and I don't know where she is.

11          Q     When Susan Hecht was involved with the  
12    preparation of what appears here as Exhibit E in the  
13    petition to deny, roughly how old was she?

14          A     Maybe she was in her sixties or seventies.

15          Q     Do you have any knowledge as to where it is that  
16    she relocated -- let me rephrase that. Is she in the San  
17    Francisco area, so far as you know?

18          A     I don't know. I don't believe she is.

19          Q     What understanding do you have as to where she may  
20    be at this point?

21          A     I had heard, you know, a rumor or whatever, that  
22    she had moved to Arizona or, you know, a retirement  
23    community in the Southwest, but I don't know.

24          Q     Fair enough. If I were to use the term 'Ownership  
25    Report', do you have, could you tell me what your

1 understanding of that term is?

2 A It's a report intended for inspection by the  
3 public, as required by the FCC, so that members of the  
4 public can ascertain who is in control of the license.

5 Q Now, in the context of a public radio station such  
6 as KALW, what information would, to your understanding,  
7 ordinarily appear on such a report?

8 A Generally for a public non-profit entity, the  
9 people who are on the board of non-profit corporations or  
10 the governmental entity or whatever.

11 Q So, in the case of KALW, it would be the School  
12 Board of San Francisco.

13 A The School Board of San Francisco and I believe  
14 the Superintendent is also on the license.

15 Q And now how often are elections held for School  
16 Board members in San Francisco?

17 A They're staggered, so they may be every two years,  
18 they may be every three years, but it's just a few positions  
19 at a time, it's not a wholesale changing of the guard.

20 Q And following an election, what responsibility, if  
21 any, would a radio station have, to your understanding, with  
22 respect to the preparation of an Ownership Report?

23 A To get a new blank Ownership Report page and fill  
24 out the new people that are on it.

25 Q So, a relatively simple task?

1 A Yeah, takes 15 minutes.

2 Q When you looked at the KALW Public Inspection File  
3 in July of 1997, what, if anything, did you see relative to  
4 station Ownership Reports?

5 A There were missing Ownership Reports, I don't  
6 recall how many but there were missing Ownership Reports.

7 Q Did you ever bring that information to anybody's  
8 attention?

9 A Yes.

10 Q Who?

11 A The board members that we met with.

12 Q In other words, the people that you mentioned  
13 earlier, Jill Wynns and Ms. Hernandez and Mr. Kelly?

14 A Yes.

15 Q Was there anybody else?

16 A I believe that a whole list of all the problems we  
17 sent to Ernie Sanchez as well.

18 Q This was prior to the time the Petition to Deny  
19 was prepared?

20 A Prior to the Petition to Deny, yes.

21 Q What, if any, response do you recall receiving  
22 from Mr. Sanchez?

23 A I don't recall.

24 Q Now, I want to show you a document that bears  
25 pages 13 through 16 of Exhibit A, from the Petition to Deny.

1     Apparently it's part of the renewal application. Could you  
2     tell me, to your understanding, what this document  
3     represents?

4             A     This is an Ownership Report that is filed with the  
5     petition, I mean with the application for renewal.

6             Q     I see. And now on what is marked as Exhibit A,  
7     page 14, there appears to be a signature, do you know whose  
8     signature that is?

9             A     That is the Superintendent of Schools, Bill Rojas.

10            Q     Now, it's always been a curiosity to me, there are  
11     parenthesis and then some other markings inside the  
12     parenthesis after the signature. Do you know what that  
13     represents?

14            A     I don't know.

15            Q     Do you have any knowledge as to whether Mr. Rojas  
16     actually signed the original of this document, or that it  
17     was somebody else who signed his name?

18            A     I don't know.

19            Q     Did you ever have any role whatsoever in creating  
20     an Ownership Report for KALW?

21            A     No.

22            Q     Did you have any role whatsoever in creating any  
23     part of an Ownership Report for KALW?

24            A     No.

25            Q     Do you know who had such a role in creating



1 Ownership Reports for KALW?

2 A I don't know.

3 Q Did you ever have any role in reviewing such a  
4 report following its creation?

5 A No.

6 Q Do you know who did have such a role?

7 A No.

8 Q Did you ever have a role in placing an Ownership  
9 Report in the KALW Public Inspection File?

10 A No.

11 Q Do you know whoever had such a role?

12 A No.

13 Q Did you ever have a role in filing an Ownership  
14 Report with the Federal Communications Commission?

15 A In the past, yes, at KTPR.

16 Q How about at KALW, did you ever have such a role?

17 A No.

18 Q Do you know who did have such a role at KALW?

19 A No, I don't.

20 Q Now, we've talked a little bit about the formation  
21 of Golden Gate Public Radio and we saw a document that  
22 established when it was formed. With respect to the  
23 Petition to Deny itself, did you personally have any role in  
24 creating the Petition to Deny?

25 A Yes, I'm the author of the document.